## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JOHN KUZNOWICZ,	
Plaintiff, )	
v. )	No. 1:11-cv-00165
WRIGLEY SALES COMPANY, LLC, et al.,	Honorable William J. Hibbler
Defendants. )	

## **DECLARATION OF JENNY COPPOLA**

The undersigned declares under penalty of perjury as follows:

1.

I, Jenny Coppola, am over eighteen (18) years of age, and I have personal knowledge of, and am fully competent to testify to, the matters set forth herein.

2.

I am a Senior Technical Specialist, Group Insurance Contracts, at The Prudential Insurance Company of America ("Prudential").

3.

The fully insured Short Term Disability ("STD") benefits and Long Term Disability ("LTD") benefits for qualifying employees of Wm. Wrigley Jr. Company ("Wrigley") were provided under Group Contract number DG-73636-IL (the "Group Contract") for the period of time from September 1, 1997 to the present.

I certify that documents D000641-D000650 are an accurate and authentic copy of the Group Contract between Prudential and Wrigley, effective September 1, 1997. I further certify that documents D000651-D000652 are an accurate and authentic copy of an amendment to Group Contract number DG-73636-IL.

5.

I certify that documents D000653-D000702 are an accurate and authentic copy of the Booklet-Certificate for (i) STD benefits for all full-time non-exempt employees, and (ii) LTD benefits for all full-time employees, other than employees classified by the employer as executives. This STD and LTD Booklet-Certificate has a Program Date of February 1, 2009 and was in effect on November 15, 2009, the alleged date of Plaintiff's disability.

6.

I certify that documents D000703-D000709 are an accurate and authentic copy of the ERISA Statement for the STD and LTD Booklet-Certificate described in Paragraph 5.

7.

I hereby certify that the documents referred to in this Declaration comprise records of regularly conducted business activity of Prudential, which were made and kept in the course of regularly conducted business activity of Prudential, and were made and kept by the regularly conducted business activity as a regular practice.

I swear or affirm, under penalty of perjury, that the foregoing statements are true and correct to the best of my knowledge and belief.

This 28<sup>th</sup> day of October, 2011.

Jenny Coppola